

### REMARKS

In the Office Action, Claims 5-8 have been allowed, and Claims 3-4 and 11-12 have been objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the rejected base claim and any intervening claims. At this time, Applicants are not submitting amendments to the objected-to claims, since Applicants believe that the rejected claims, Claims 1-2 and 9-10 are also allowable over the cited prior art.

Claims 1 and 9 have been rejected as unpatentable over the teachings of the Graefe patent, and Claims 2 and 10 have been rejected as anticipated by the combined teachings of the Graefe and Li patents. Applicants first note that the rejection of Claims 2 and 10 as ***anticipated under 35 USC 102(e)*** appears to be in error since the Examiner states that it would have been ***obvious to modify*** the Graefe patent teachings with the teachings of the Li patent. It appears that the rejection was in error.

In response to the rejections, Applicants first respectfully assert that the Graefe patent does not teach or suggest the invention as set forth in Claims 1 and 9. The Graefe patent is directed to a system and method wherein one can "...interchange a dimension represented in a table as a set of columns with a dimension represented as a set of rows" (see: the cited teachings from Col. 1, line 62-Col. 2, line 25, specifically Col. 2, lines Y0998-220

1-2). The Graefe system retrieves specific data which has been requested. It does not perform "fuzzy", matching searches with iterative user refinement, database transformation, and transformed database searching as is claimed. Rather, the Graefe system retrieves and displays specifically requested data. If the Graefe system does not find the requested data, it does not retrieve anything. Furthermore, the Graefe system does not accept user input for query refinement. Finally, the Graefe system does not transform its database, it simply rotates a display of specifically-requested data which has been retrieved from the database.

With specific reference to the pending claim language, the Graefe patent provides no teaching of receiving user input after presenting retrieved data to a user. In support of the rejection, the Examiner states that the Graefe system receives user input before searching the data. However, the claim clearly sets forth the steps of retrieving data based on a query, receiving user input; and, then, transforming the database in response to the user input. Clearly it cannot be maintained that the Graefe system teaches or suggests receiving user input after having presented retrieved data. Graefe simply retrieves what has been specifically requested by the user and does not accept further user input until the next specific user request for data.

In rejecting the claimed step of transforming the database based on user input, the Examiner has stated that Graefe

"transform(s) a database table from one perspective to another-to rotate the dimension of the data..." Applicants respectfully point out that rotating a display of data is not the same nor suggestive of transforming a database based on user input, let alone based on user input received in response to retrieved query results. Furthermore, Applicants argue that Graefe provides no teaching of generating a transformed database which is thereafter searched. Graefe neither teaches nor suggests manipulating its database into a transformed database. Graefe simply retrieves expressly-requested data and manipulates the **display** of the retrieved data.

Finally, Graefe provides no teaching of iteratively repeating the steps, of retrieving query results, accepting user input, transforming the database based on user input, and searching the transformed database to present more retrieved results, until the query is satisfied. The Examiner provides no citation of Graefe teachings in rejecting the claimed steps of successively searching and iteratively repeating the steps. Rather, the Examiner states that the Graefe "...information implies that it is obvious that the system have (sic) to repeat steps b through e in order to return to the user a result." Applicants respectfully disagree with the Examiner's conclusion. The Graefe patent teaches that expressly-requested data is retrieved in response to the single request and that the display of that data can be manipulated. There is no disclosure or

suggestion in Graefe that multiple iterations of data retrieval and display be conducted to satisfy a query. It is well established under U.S. Patent Law that there must be some teaching or suggestion in the cited art to sustain an obviousness rejection. Absent some teaching of retrieving, receiving input, transforming, searching, and iteratively repeating same, it cannot be maintained that the Graefe patent renders the claim language obvious. Accordingly, Applicants request that the rejections of Claims 1 and 9 be withdrawn.

The Examiner has additionally cited the Li patent in rejecting the language of Claims 2 and 10. It is first to be noted that the Examiner has stated that the claims are **anticipated** by the teachings of the two cited patents. However, the Examiner then goes on to use obviousness-type reasoning in rejecting the claim language. Applicants request clarification of the rejection.

Next, Applicants respectfully assert that one having ordinary skill in the art would not logically seek to modify the Graefe patent system with the user feedback teachings of the Li patent. The Graefe system retrieves and manipulates display of data which has been expressly requested. Graefe does not provide multiple matches or similarity measures based on the user request. Graefe simply retrieves expressly-identified data based on a single specific user request. Clearly the Graefe system

would not require query refinement if the query simply consists of an express request for identified data.

The inventive aspect of Graefe is not the searching, it is the method by which the display of the requested data could be manipulated. Clearly, one would not seek to modify the Graefe simple retrieval teachings with the Li fuzzy search teachings regarding query refinement.

Moreover, Applicants contend that, even if one were motivated to modify Graefe with the Li patent teachings, one would not arrive at the invention as claimed. Since the Graefe patent teaches that data be retrieved once and then the display be manipulated, the Li query reformulation teachings would not logically be applied to the initial user input of a retrieval request. Similarly, the Li query reformulation teachings would not logically apply to altering the data manipulation preferences. Applicants respectfully conclude, then, that the Li patent teachings could only be applied to Graefe if the user data retrieval request yielded **no results** (e.g., if the user mistyped the initial data request). Only then would the Graefe system require query reformulation.

Clearly even if one were to modify Graefe to prompt the user to re-enter the query, such combination would not anticipate or obviate the claimed invention, since the combination would still not include the claimed steps of retrieving query results, receiving user input regarding the query results, transforming

the database comprising reformulating the query based on the user input, searching the transformed database, and iteratively repeating the steps. Accordingly, Applicants respectfully request withdrawal of the rejections of Claims 2 and 10.

Applicants include herewith a Declaration of Prior Invention which has been executed by all of the inventors of the invention which is the subject of the pending application. The Declaration under 37 CFR 1.131 establishes that the present invention was completed in the United States at a date prior to March 16, 1998, which is the earliest effective date of the cited references. Therefore, Applicants not only assert that the Graefe and Li patents do not obviate the invention as claimed, but also assert that the Graefe and Li patents are not available as references against the present application.

Based on the foregoing remarks and the enclosed Declaration, Applicants respectfully request withdrawal of the objections and rejections, and issuance of the pending claims.

Respectfully submitted,  
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